

TC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA) No. 08 CR 401
v.)
ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock") Violations: Title 21, United States Code, Sections 841, 843, 846, and 856, and Title 18, United States Code, Sections 2, 922(g)(1), 924(c)
KEVIN MASUCA, aka "Zook")
IVORY WATSON, aka "Bird")
AHMAD WILLIAMS, aka "AG")
DANIEL COPRICH)
UBEX LOPEZ, aka "Little Man")
SANFORD TOWNSEND, JR., aka "4-5")
VINCENT STRAUGHTER, aka "Vino")
COREY WILLIAMS)
JAMAL WASHINGTON, aka "Mal")
GLENN ISLAND, aka "Baby Dough")
SHIEMIKA MASON, aka "Tameka Grant" and "Meka")
JOHNNIE LAVELL YOUNG, aka "Vell")
JOSHUA MCELROY, aka "Boss Hog")
DWAYNE GARRETT)
PATRICK JONES)
SCOTT O'NEAL)
ANDREA THOMAS)
MICHAEL GONZALEZ)
ROMELL HOLLINGSWORTH, aka "Grosso")
DESHAUN GERMANY, aka "4-5's Cousin")
JOE LONG)
CHRISTOPHER GAVIN)
LATASHA WILLIAMS, aka "Tasha B")
ETHEL J. HAROLD, aka "Jeanette")
MAXINE RUFFETTI)
MAY WATSON)

**JUDGE ZAGEL
MAGISTRATE JUDGE ASHMAN**

FILED

AUG 8 2008 TC
AUG 21 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

COUNT ONE

The SPECIAL JUNE 2007 GRAND JURY charges:

- Beginning in or around 2007, and continuing until in or around May 2008, in

Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock",
KEVIN MASUCA, aka "Zook",
IVORY WATSON, aka "Bird",
AHMAD WILLIAMS, aka "AG",
DANIEL COPRICH,
UBEX LOPEZ, aka "Little Man",
SANFORD TOWNSEND, JR., aka "4-5",
VINCENT STRAUGHTER, aka "Vino",
COREY WILLIAMS,
JAMAL WASHINGTON, aka "Mal",
GLENN ISLAND, aka "Baby Dough",
SHEMIKA MASON, aka "Tameka Grani" and "Mcka",
JOHNNIE LAVELL YOUNG, aka "Vell",
JOSHUA MCELROY, aka "Boss Hog",
MICHAEL GONZALEZ,
DESHAUN GERMANY, aka "4-5's Cousin",
JOE LONG,
LATASHA WILLIAMS, aka "Tasha B",
ETHEL J. HAROLD, aka "Jeanette",
MAXINE RUFFETTI,
MAY WATSON,

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, knowingly and intentionally to distribute and to possess with intent to distribute controlled substances, namely, 50 grams or more of mixtures and substances containing cocaine base in the form of crack cocaine ("crack cocaine"), a Schedule II Narcotic Drug Controlled Substance, and 5 kilograms or more of mixtures and substances containing cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. It was part of the conspiracy that defendant ISAIAH HICKS ran a narcotics distribution organization (hereinafter "the HICKS Drug Trafficking Organization," or "the HICKS DTO"). ISAIAH HICKS, on behalf of the HICKS DTO, coordinated the purchase of kilogram

quantities of powder cocaine from various suppliers, including defendant UBEX LOPEZ. Defendant MICHAEL GONZALEZ assisted UBEX LOPEZ in the distribution of cocaine to HICKS and other members of the HICKS DTO and in the collection of narcotics proceeds.

3. It was further part of the conspiracy that HICKS caused both powder cocaine and crack cocaine to be packaged into wholesale quantities for resale to others. The HICKS DTO sold wholesale quantities of powder cocaine and crack cocaine in the Chicago area, including in and around the neighborhood area centered around the block bordered by West 54th Street on the north, Garfield Boulevard to the south, South Hoyne Avenue to the west, and South Seeley Avenue to the east, and elsewhere in Chicago, Illinois.

4. It was further part of the conspiracy that DANIEL COPRICH arranged for the purchase by ISAIAH HICKS of kilogram quantities of powder cocaine from cocaine suppliers.

5. It was further part of the conspiracy that the powder cocaine and crack cocaine distributed by the HICKS DTO were typically prepared and packaged by ISAIAH HICKS and others, including KEVIN MASUCA and LATASHA WILLIAMS. The powder cocaine and crack cocaine distributed by the HICKS DTO were packaged at different times in apartments located in the Chicago area, including at 6020 South Carpenter, 6152 South Albany, and 5358 South Hoyne Avenue.

6. It was further part of the conspiracy that HICKS used several persons as "runners" to deliver drugs to customers, including, KEVIN MASUCA, IVORY WATSON, AHMAD WILLIAMS, and JAMAL WASHINGTON.

7. It was further part of the conspiracy that the HICKS DTO supplied wholesale quantities of powder cocaine and crack cocaine to various co-conspirators, including SHEMIKA

MASON, JOHNNIE LAVELL YOUNG, JOSHUA MCELROY, DESHAUN GERMANY, LATASHA WILLIAMS, ETHEL J. HAROLD, JOE LONG, VINCENT STRAUGHTER, GLENN ISLAND, DANIEL COPRICH, MAXINE RUFFETTI, SANFORD TOWNSEND, JR. and MAY WATSON. The powder cocaine and crack cocaine were commonly "fronted" to these co-conspirators, meaning the cocaine was provided to them with the understanding that they would make a complete payment for the powder cocaine and crack cocaine later after they resold the cocaine to their own customers. These co-conspirators further distributed the powder cocaine and crack cocaine they obtained from the HICKS DTO to customers around the Chicago area and elsewhere.

8. It was further part of the conspiracy that, at various times, KEVIN MASUCA, MAY WATSON, and other co-conspirators, stored powder cocaine and crack cocaine for the HICKS DTO at their residences.

9. It was further part of the conspiracy that DANIEL COPRICH, COREY WILLIAMS, and other co-conspirators, served as "brokers" for the HICKS DTO by negotiating and facilitating narcotics transactions with customers.

10. It was further part of the conspiracy that the defendants and other co-conspirators possessed and carried firearms to advance the conspiracy's objectives of selling cocaine and crack cocaine, and to preserve and protect the cocaine and crack cocaine, as well as the proceeds of the narcotics sales.

11. It was further part of the conspiracy that certain defendants regularly called to and from cellular telephones and land-line telephones to facilitate their drug transactions.

12. It was further part of the conspiracy that defendants and other co-conspirators would

and did conceal and hide, and cause to be concealed and hidden, the purposes of the acts done in furtherance of the conspiracy, and would and did use surveillance, counter-surveillance techniques, coded language, cellular telephones, and other means to avoid detection and apprehension by law enforcement authorities and otherwise to provide security to the members of the conspiracy.

In violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT TWO

The SPECIAL JUNE 2007 GRAND JURY charges:

On or about April 26, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,
and elsewhere,

COREY WILLIAMS, and
JAMAL WASHINGTON, aka "Mal",

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 50
grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II
Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States
Code, Section 2.

COUNT THREE

The SPECIAL JUNE 2007 GRAND JURY charges:

On or about May 17, 2007, at Chicago, in the Northern District of Illinois, Eastern Division,

and elsewhere,

COREY WILLIAMS, and
JAMAL WASHINGTON, aka "Mal",

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT FOUR

The SPECIAL JUNE 2007 GRAND JURY charges:

On or about October 1, 2007, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

COREY WILLIAMS, and
JAMAL WASHINGTON, aka "Mal",

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT FIVE

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about February 27, 2008, at approximately 12:28 p.m. (Call # 15256), in the Northern District of Illinois, Eastern Division, and elsewhere,

SANFORD TOWNSEND, JR, aka "4-5", defendant herein, knowingly and intentionally used a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute a controlled substance as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT SIX

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about February 27, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOSHUA MCELROY, aka "Boss Hog", defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about February 28, 2008, at approximately 10:16 a.m. (Call # 15407), in the Northern District of Illinois, Eastern Division, and elsewhere,

ISAIAH HICKS, aka "Chill Rock" and "Chub Rock", and SANFORD TOWNSEND, JR, aka "4-5",

defendants herein, knowingly and intentionally used a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 846, namely, conspiracy to possess with intent to distribute a controlled substance as charged in Count One of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT EIGHT

The SPECIAL JUNE 2007 GRAND JURY charges:

On or about February 28, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock",
KEVIN MASUCA, aka "Zook", and
COREY WILLIAMS,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT NINE

The SPECIAL JUNE 2007 GRAND JURY charges:

On or about March 3, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DWAYNE GARRETT, and
PATRICK JONES,

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT TEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 2, 2008, at approximately 4:44 p.m. (Call # 0151), in the Northern District of Illinois, Eastern Division, and elsewhere,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock", and DWAYNE GARRETT,

defendants herein, knowingly and intentionally used a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), namely, possession with intent to distribute a controlled substance as charged in Count Nine of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT ELEVEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 7, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SCOTT O'NEAL, and
ANDREA THOMAS,

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 5 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT TWELVE

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 7, 2008, at approximately 3:17 p.m. (Call # 16522), in the Northern District of Illinois, Eastern Division, and elsewhere,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock", and SCOTT O'NEAL,

defendants herein, knowingly and intentionally used a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), namely, possession with intent to distribute a controlled substance as charged in Count Eleven of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTEEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 8, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHEMIKA MASON, aka "Tameka Grant" and "Meka", defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOURTEEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 12, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

VINCENT STRAUGHTER, aka "Vino",

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTEEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 13, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

UBEX LOPEZ, aka "Little Man", and
MICHAEL GONZALEZ,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 500 grams or more of mixtures containing cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT SIXTEEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 13, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock" and
IVORY WATSON, aka "Bird",

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 13, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SCOTT O'NEAL, and
ANDREA THOMAS,

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 13, 2008, at approximately 10:25 a.m. (Call # 17267), in the Northern District of Illinois, Eastern Division, and elsewhere,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock", and SCOTT O'NEAL,

defendants herein, knowingly and intentionally used a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), namely, distribution and possession with intent to distribute a controlled substance as charged in Counts Sixteen and Seventeen of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT NINETEEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 15, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ROMELL HOLLINGSWORTH, aka "Grosso",

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about March 15, 2008, at approximately 8:00 p.m. (Call # 17744), in the Northern District of Illinois, Eastern Division, and elsewhere,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock", and ROMELL HOLLINGSWORTH, aka "Grosso",

defendants herein, knowingly and intentionally used a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), namely, possession with intent to distribute a controlled substance as charged in Count Nineteen of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-ONE

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about April 8, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock",
LATASHA WILLIAMS, aka "Tasha B", and
KEVIN MASUCA, aka "Zook",

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT TWENTY-TWO

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about April 25, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

AHMAD WILLIAMS, aka "AG",

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-THREE

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about May 1, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOSHUA MCELROY, aka "Boss Hog",

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-FOUR

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about May 2, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOE LONG,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-FIVE

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about May 2, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

GLENN ISLAND, aka "Baby Dough",

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-SIX

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about May 6, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

CHRISTOPHER GAVIN,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-SEVEN

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about May 6, 2008, at approximately 5:36 p.m. (Call # 3893), in the Northern District of Illinois, Eastern Division, and elsewhere,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock", and CHRISTOPHER GAVIN,

defendants herein, knowingly and intentionally used a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony violation of Title 21, United States Code, Section 841(a)(1), namely, possession with intent to distribute a controlled substance as charged in Count Twenty-Six of this Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-EIGHT

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about May 10, 2008, at Chicago, in the Northern District of Illinois, Eastern Division,

KEVIN MASUCA, aka "Zook",

defendant herein, knowingly possessed a firearm, namely, a Colt .357 Magnum revolver, bearing serial number 28645 and a .40 caliber Beretta handgun, Model 96D, bearing serial number BER0003196M, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a violation of Title 21, United States Code, Section 846, as more fully set forth in Count One of this indictment;

In violation of Title 18, United States Code, Section 924(c).

COUNT TWENTY-NINE

The SPECIAL JUNE 2007 GRAND JURY further charges:

, On or about May 21, 2008, at Harvey, in the Northern District of Illinois, Eastern Division, and elsewhere,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock", defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 50 grams or more of mixtures containing cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about May 21, 2008, at Harvey, in the Northern District of Illinois, Eastern Division,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock", defendant herein, knowingly possessed a firearm, namely, a Colt .357 Magnum revolver, bearing serial number 28645 and a .40 caliber Beretta handgun, Model 96D, bearing serial number BER0003196M, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a violation of Title 21, United States Code, Sections 846, as more fully set forth in Count One of this indictment, and, a violation of Title 21, United States Code, Section 841(a)(1), as more fully set forth in Count Thirty-One of this indictment;

In violation of Title 18, United States Code, Section 924(c).

COUNT THIRTY-ONE

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about May 21, 2008, at Harvey, in the Northern District of Illinois, Eastern Division,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock", defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, namely, a Colt .357 Magnum revolver, bearing serial number 28645 and a .40 caliber Beretta handgun, Model 96D, bearing serial number BER0003196M, in that the firearm had traveled in interstate commerce prior to the defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTY-TWO

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about May 21, 2008, at Chicago, in the Northern District of Illinois, Eastern Division,

DANIEL COPRICH,

defendant herein, having previously been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, namely, a Jiminez Arms Model JA25, .25 caliber semi-automatic handgun, bearing serial number 025024 and a Jiminez Arms Model JA380, .380 caliber semi-automatic handgun, bearing serial number 022195, in that the firearm had traveled in interstate commerce prior to the defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTY-THREE

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about June 28, 2007, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

MAY WATSON,

defendant herein, did control as an owner a place, namely, a residence located at 5358 South Hoyne Avenue, Chicago, Illinois, Permanent Index Number:20-07-315-038-0000, and knowingly and intentionally made available for use the place for the unlawful storage and distribution of a controlled substance, namely, cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug controlled substance;

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT THIRTY-FOUR

The SPECIAL JUNE 2007 GRAND JURY further charges:

On or about April 8, 2008, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LATASHA WILLIAMS, aka "Tasha B",

defendant herein, did control as a lessee a place, namely, a residence located at 6152 South Albany Avenue, Chicago, Illinois, and knowingly and intentionally made available for use the place for the unlawful manufacturing and storing of a controlled substance, namely, cocaine base in the form of crack cocaine, a Schedule II Narcotic Drug controlled substance;

In violation of Title 21, United States Code, Section 856(a)(2).

FORFEITURE ALLEGATION ONE

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations of Counts One through Twenty-Seven, Twenty-Nine, Thirty-Three, and Thirty Four of this Indictment are realleged and incorporated by reference as if fully restated herein for the purpose of alleging that certain property is subject to forfeiture to the United States pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of their violations of Title 21, United States Code, Sections 841(a)(1), 846, and 856(a)(2), as alleged in the foregoing Indictment,

ISAIAH HICKS, aka "Chill Rock" and "Chubb Rock",
KEVIN MASUCA, aka "Zook",
IVORY WATSON, aka "Bird",
AIIMAD WILLIAMS, aka "AG",
DANIEL COPRICH,
UBEX LOPEZ, aka "Little Man",
SANFORD TOWNSEND, JR., aka "4-5",
VINCENT STRAUGHTER, aka "Vino",
COREY WILLIAMS,
JAMAL WASHINGTON, aka "Mal",
GLENN ISLAND, aka "Baby Dough",
SHEMIKA MASON, aka "Tameka Grant" and "Meka",
JOHNNIE LAVELL YOUNG, aka "Vell",
JOSHUA McELROY, aka "Boss Hog",
MICHAEL GONZALEZ,
DWAYNE GARRETT,
MICHAEL GONZALEZ,
DESHAUN GERMANY, aka "4-5's Cousin",
LATASHA WILLIAMS, aka "Tasha B",
ETHEL J. HAROLD, aka "Jeanette",
MAXINE RUFFETTI,
MAY WATSON,

defendants herein, shall forfeit to the United States of America, pursuant to Title 21, United

States Code, Sections 853(a)(1) and (2): (1) any and all property constituting and derived from any proceeds the defendants obtained, directly and indirectly, as a result of said violations; and (2) any and all property used, and intended to be used, in any manner or part to commit and to facilitate the commission of said violations.

3. The interests of the defendants, jointly and severally, subject to forfeiture to the United States pursuant to Title 21, United States Code, Section 853, include, but are not limited to, in excess of \$1,100,000 in United States currency representing proceeds of the narcotics distribution organization, and the following property:

a. Real Property:

- (1) The property located at 5358 South Hoyne Avenue, Chicago, Illinois, legally described as:

LOT 25 IN T.W. KIRBY'S SUBDIVISION OF LOT 24 IN
INGLEHART'S SUBDIVISION OF THE SOUTH WEST
1/4 OF SECTION 7, TOWNSHIP 38 NORTH, RANGE
14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN
COOK COUNTY ILLINOIS.

Permanent Real Estate Index Number: 20-07-315-038-0000.

b. United States Currency:

- (2) \$1,125.00 of United States Currency seized on March 3, 2008, from DWAYNE GARRETT;
- (3) \$1,250.00 of United States Currency seized on March 5, 2008, from DANIEL COPRICH;
- (4) \$1,850.86 of United States Currency seized on May 21, 2008, from the residence located at 8024 S. Honore St., Chicago, Illinois;

- (5) \$400.00 of United States Currency seized on May 21, 2008, from the residence located at 15231 Lincoln Ave., Harvey, Illinois;
- (6) \$120.00 of United States Currency seized on May 21, 2008, from the residence located at 15231 Lincoln Ave., Harvey, Illinois;
- (7) \$27,100.00 of United States Currency seized on May 21, 2008, from the residence located at 15231 Lincoln Ave., Harvey, Illinois;
- (8) \$197.00 of United States Currency seized on May 21, 2008, from the residence located at 5358 S. Hoyne Ave., Chicago, Illinois;
- (9) \$1,892.00 of United States Currency seized on May 21, 2008, from the residence located at 8145 S. Lorel Ave., Burbank, Illinois;
- (10) \$10,505.00 of United States Currency seized on May 21, 2008, from the residence located at 8145 S. Lorel Ave., Burbank, Illinois; and
- (11) \$3,121.00 of United States Currency seized on May 21, 2008, from DESHAUN GERMANY.

c. Firearms

- (12) one Colt .357 Magnum revolver, bearing serial number 28645, and ammunition, seized on May 21, 2008, from the residence located at 15231 Lincoln Ave, Harvey, Illinois;
- (13) one Beretta .Model 96D, 40 caliber handgun, bearing serial number BER0003196M, and ammunition, seized on May 21, 2008, from the residence located at 15231 Lincoln Ave, Harvey, Illinois;
- (14) one Jiminez Arms Model JA25, .25 caliber semi-automatic handgun, bearing serial number 025024, and ammunition, seized on May 21, 2008, from the residence located at 8024 S. Honore St., Chicago, Illinois; and
- (15) one Jiminez Arms Model JA380, .380 caliber semi-automatic handgun, bearing serial number 022195, and ammunition, seized on May 21, 2008, from the residence located at 8024 S. Honore St., Chicago, Illinois.

d. Motor Vehicles

- (16) One 2000 Cadillac Deville, VIN: 1G6KD54YXYU312523, seized on May 21, 2008, from the residence located at 8024 S. Honore St., Chicago, Illinois;
- (17) One 1998 Jaguar XK8, VIN: SAJGX2247WC027422, seized on May 21, 2008, from the residence located at 2127 W. 54th St., Chicago, Illinois;
- (18) One 2002 Chevrolet Tahoe, VIN: 1GNEK13Z22R204336, seized on May 21, 2008, from the residence located at 8145 S. Lorel Ave., Burbank, Illinois.

4. By virtue of the defendants' commission of the offenses charged in Counts One through Twenty-Seven, Twenty-Nine, Thirty-Three, and Thirty Four of this Indictment, all right, title or interest that any defendant has in the above-described property is vested in the United States and hereby forfeited to the United States pursuant to Title 21, United States Code, Section 853.

5. If any of the forfeitable property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), as a result of any act or omission of the defendants:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to the provisions of Title 21, United States Code,

Section 853(p), to seek forfeiture of substitute property belonging to defendants, pursuant to Title 21, United States Code, Section 853.

FORFEITURE ALLEGATION TWO

The SPECIAL JUNE 2007 GRAND JURY further charges:

1. The allegations contained in Counts Twenty-Eight, Thirty, Thirty-One, and Thirty-Two of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of their violations of Title 18, United States Code, Sections 922(g)(1) and 924(c), as alleged in Counts Twenty-Eight, Thirty, Thirty-One, and Thirty-Two of the foregoing Indictment,

ISAIAH HICKS, aka "Chill Rock," and "Chubb Rock,"
KEVIN MASUCA, aka "Zook," and
DANIEL COPRICH,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section, 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest they may have in any property involved in the charged offenses.

3. The interests of the defendants subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) include, but are not limited to, the following:

- (a) one Colt .357 Magnum revolver, bearing serial number 28645, and ammunition, seized on May 21, 2008, from the residence located at 15231 Lincoln Ave, Harvey, Illinois;
- (b) one Beretta Model 96D, 40 caliber handgun, bearing serial number BER0003196M, and ammunition, seized on May 21, 2008, from the residence located at 15231 Lincoln Ave, Harvey, Illinois;
- (c) one Jiminez Arms Model JA25, .25 caliber semi-automatic handgun,

bearing serial number 025024, and ammunition, seized on May 21, 2008, from the residence located at 8024 S. Honore St., Chicago, Illinois; and

(d) one Jimincz Arms Model JA380, .380 caliber semi-automatic handgun, bearing serial number 022195, and ammunition, seized on May 21, 2008, from the residence located at 8024 S. Honore St., Chicago, Illinois.

4. If any of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants:

- (a) Cannot be located upon the exercise of due diligence;
- (b) Has been transferred or sold to, or deposited with, a third party;
- (c) Has been placed beyond the jurisdiction of the court;
- (d) Has been substantially diminished in value; or
- (e) Has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to the provisions of Title 21, United States Code, Section 853(p), to seek forfeiture of substitute property belonging to defendants, pursuant Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY